

Roberts v. Randy L L Corp

Ted Roe <tedr@veritasbusinesslaw.com>
To: JESSICA MOLLIGAN <jessicamolligan@comcast.net>

Fri, Sep 13, 2024 at 11:27 AM

Ms. Molligan:

The Court did not stay the deadlines for discovery. You failed to meet the filing deadlines for the Defendant's second and third RFP, RFA and interrogatories. Objections are waived and the RFAs are deemed admitted. That is black letter law. If you could not meet these deadlines, you were required to obtain either my consent to extend the deadlines or an order of the Court extending the deadlines. You did neither.

We will be filing a motion for summary judgment on the basis of those admissions.

Further, your untimely responses to the Defendant's RFA would be improper even if they were timely. Your attempt to assert untimely objections and not answer the RFA, continues to illustrate your bad faith engagement in this litigation, which we will be bringing to the Court's attention when we seek sanctions against you.

Ted Roe

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